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7 Attorneys for Defendant  
**GOLDMAN SACHS BANK USA**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

2 Tatyana Rotkin, ) Case No. 2:22-cv-01170-MCE-JDP  
3 Plaintiff, )  
4 v. ) [Assigned to Hon. Morrison C. England,  
5 Goldman Sachs Bank USA, ) Jr.]  
6 Defendant. )  
7 ) **STIPULATION AND ORDER TO**  
8 ) **ARBITRATE AND STAY ACTION**  
9 )  
10 ) Action Filed: July 6, 2022  
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1 Plaintiff Tatyana Rotkin (“Plaintiff”) and defendant Goldman Sachs Bank  
2 USA (“GS Bank” and together, with Plaintiff, the “Parties”), by and through their  
3 undersigned counsel, hereby stipulate to stay this action against GS Bank, and to  
4 submit all claims against GS Bank to binding individual arbitration before JAMS,  
5 pursuant to the terms of the arbitration provision contained in the operative GS Bank  
6 Cardmember Agreement governing Plaintiff’s account with GS Bank. Plaintiff takes  
7 no position as to the validity of the arbitration provision contained in the operative  
8 GS Bank Cardmember Agreement, and is agreeing to submit the claims to arbitration  
9 in an effort to avoid incurring additional fees and costs.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between  
11 Plaintiff and GS Bank, through their respective counsel of record, that: (1) Plaintiff  
12 shall submit her claims against GS Bank in this action to arbitration before JAMS,  
13 pursuant to the arbitration agreement between Plaintiff and GS Bank; and (2) all  
14 proceedings in this matter are stayed pending completion of arbitration.

15 **IT IS SO STIPULATED.**

16  
17 Dated: August 30, 2022

18  
19 STROOCK & STROOCK & LAVAN LLP  
20 ARJUN P. RAO  
21 SHERI GUERAMI

22 By: \_\_\_\_\_/s/ *Sheri Guerami*  
23 \_\_\_\_\_  
24 Sheri Guerami

25  
26 Attorneys for Defendant  
27 GOLDMAN SACHS BANK USA  
28

2029 CENTURY PARK EAST, 18TH FLOOR  
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1 Dated: August 30, 2022

PRICE LAW GROUP, APC  
YOUSSEF H. HAMMOUD

3 By: /s/ Youssef H. Hammoud  
4 Youssef H. Hammoud

5 Attorneys for Plaintiff  
6 TATYANA ROTKIN

7

8 **ORDER**

9 Pursuant to the stipulation of the parties, (1) Plaintiff shall submit her claims  
10 against GS Bank in this action to arbitration before JAMS, pursuant to the arbitration  
11 agreement between Plaintiff and GS Bank; and (2) all proceedings in this matter are  
12 stayed pending completion of arbitration. Not later than sixty (60) days following  
13 the date this Order is electronically filed, and every sixty (60) days thereafter until  
14 the stay is lifted, the parties shall file with the Court a Joint Status Report advising as  
15 to the status of their arbitration.

16 IT IS SO ORDERED.

17 Dated: September 8, 2022

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20 MORRISON C. ENGLAND, JR.  
21 SENIOR UNITED STATES DISTRICT JUDGE  
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